

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

DAVID STONE,

Defendant.

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DECLARATION IN SUPPORT  
OF FINAL ORDER OF  
FORFEITURE

22 Cr. 510 (MKV)

Andrew Thomas, pursuant to Title 28, United State Code, Section 1746, declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.
2. On or about September 28, 2022, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property (ECF Doc. 20) with respect to DAVID STONE (the "Defendant"), forfeiting to the United States all right, title and interest of the Defendant in the following specific property:
  - a. 100 shares of stock of Snowflake (SNOW) held in Charles Schwab account 8790-3069;
  - b. 0.369 shares of stock of Coupa Software (COUP) held in Fidelity account X85-822018; and
  - c. 100 shares of stock of the Toro Company (TTC) held in TD Ameritrade account 427-406617

(a. through c. collectively, the “Specific Property”);

3. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on November 2, 2022, for thirty consecutive days, through December 01, 2022, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court on February 14, 2023 (ECF Doc. 35);

4. Since final publication of the Notice of Forfeiture, thirty days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

5. The Defendant is the only person and/or entity known by the Government to have a potential interest in the Specific Property.

6. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.

7. No previous application for the relief requested herein has been sought.

Dated: New York, New York  
February 14, 2023

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:



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